Page 170

1 hypothetical message.

2 BY MS. BARKER:

- O Would you agree that it is important in a
- 4 documentary or a documentary series to ensure that
- 5 subjects, meaning people who are portrayed in the film or
- 6 series, are portrayed accurately?
- A As a general -- that's a broad question. But
- 8 the general tenet in documentary filmmaking is yes.
- MS. BARKER: And I just have a few more
- 10 questions, as I mentioned, but it does involve
- 11 Exhibit 11.
- So, I would request, Mr. Videographer, if you 12
- 13 would please hand to the witness Exhibit 11.
- (Exhibit 11 was marked for identification, a
- 15 copy of which is attached hereto.)
- THE WITNESS: I have it. 16
- 17 BY MS. BARKER:
- Q Okay. Thank you.
- And backtracking for a second. There are two 19
- 20 questions that don't relate that I wanted to ask and then
- 21 I will wrap up with those.
- Did you review all of the final cuts of the
- 23 Making a Murderer Season 1 episodes before they were
- 24 publicly aired?
- THE WITNESS: I don't have a clear recollection 25

Page 171

1 of that, but I imagine that I did.

- 2 BY MS. BARKER:
- Q Okay. They were all approved, in any case, by
- 4 Netflix creative prior to their being publicly released;
- 5 correct?
- A That's correct.
- Q In -- in -- Net- -- in one of the episodes of
- 8 Season 1 of Making a Murderer, there are some individuals
- 9 who are shown speaking from a pool hall. Do you recall
- 10 that scene?
- A Do you have a little more context? Sorry, I'm
- 12 not (inaudible) --
- THE REPORTER: Please repeat what you said after 13
- 14 "I'm not."
- THE WITNESS: I'm not remembering. 15
- 16 BY MS, BARKER:
- Q Sure. 17
- I can direct you, actually, to the correct page, 18
- 19 I think, in Exhibit 11.
- Directing you to Exhibit 11, which I'll 20
- 21 represent to you is the Second Amended Complaint filed by
- 22 Mr. Colborn in this case.
- And directing your attention, specifically, to
- 24 page 36 of 56, if you see the folio at the bottom.
- A Okay. I'm there.

O So, under the subhead that says,

- 2 "Season 1-Episode 3," there's some bracketed text, and
- 3 then there are three paragraphs that start with the words
- 4 "Unidentified woman" or "man," slash, "bar patron" in
- 5 colons. If you'll take a moment and review those.
- A Okay. I'll read that now.
- 7 O Thank you.
- Do you want me to stop after -- where do you
- want me to stop?
- Q The bottom of the page is fine. 10
- 11 A Okay. I've read it.
- Q And my question is -- well, first, does that --12
- 13 does reviewing that trigger a recall of the individuals
- 14 in the pool hall as featured in Making a Murderer?
- A It's really vague. I have not watched the
- 16 series in years and years. So, I do have a vague
- 17 recollection of this sequence.
- Q Okay. So, my question was simply whether you
- knew the identities of those individuals.
- A Do not. 20
- O Okay. And, similarly, I'm assuming you don't 21
- 22 know anything about them personally?
- A I've never been to Manitowoc, Wisconsin. 23
- O I understand that. I didn't mean do you 24
- 25 personally know them. I meant as far as any details

Page 172

- I about them that may have been provided to you, you either
- 2 don't know or don't recall; is that correct?
- A I don't know.
- Q Then, directing your attention forward in the
- 5 document to the page that is -- has page 55 of 56 in the
- 6 folio at the bottom.
 - A Okay. I'm there.
- Q At the bottom of the page, above the page number
- 9 "12," that's printed on the page, there's a -- some
- 10 bracketed highlighted text that starts with "Strang,"
- 11 colon. Do you see that?
- A I'm not -- I see "Strang." I'm just not sure 12
- 13 which line you're referring to.
- O Right now I'm referring, for reference, to the
- 15 very last reference to "Strang" on that page. The one
- 16 that is opposite of where "This call sounded like
- 17 hundreds of other ... "
- A Oh. At the very bottom? 18
- 19 0 Yes.
- A Yes. I see the line. 20
- Q Okay. And then above that there's bracketed 21
- 22 text that says, "sustained objection omitted." Do you
- 23 see that?
- 24 A I do.
- 25 Q And then above that there's another paragraph

44 (Pages 170 - 173)